

EXHIBIT A TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
WOODBRIDGE GROUP OF COMPANIES, LLC, <i>et al.</i> , ²	Case No. 17-12560 (BLS)
Remaining Debtors.	(Jointly Administered)
MICHAEL GOLDBERG, as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, <i>et al.</i> ,	Adv. Proc No. 19- _____ (BLS)
Plaintiff,	
v.	
[DEFENDANT NAME],	
Defendant.	

**STIPULATION TO TOLL
DISCOVERY UNTIL AFTER THE CONCLUSION OF MEDIATION**

Plaintiff Michael Goldberg, (the “Plaintiff”), as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, *et al.*, and the above-captioned defendant (the “Defendant” and together with the Plaintiff, the “Parties”), hereby agree and stipulate that, in accordance with the scheduling order dated _____, 2020, discovery shall be tolled until after the filing of a mediator’s Certificate of Completion pursuant to Local Rule 9019-5(f)(ii).

² The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

Dated: _____, 2017

[FIRM]

PACHULSKI STANG ZIEHL & JONES LLP

By: _____
[Attorney]
[Address]
[City, State, Zip]
Tel: _____
Fax: _____
Email: _____

Counsel for Defendant

By: _____
Richard M. Pachulski (CA Bar No. 90073)
Andrew W. Caine (CA Bar No. 110345)
Bradford J. Sandler (DE Bar No. 4142)
Colin R. Robinson (DE Bar No. 5524)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899 (Courier 19801)
Telephone: 302-652-4100
Fax: 302-652-4400
Email: rpachulski@pszjlaw.com
acaine@pszjlaw.com
bsandler@pszjlaw.com
crobinson@pszjlaw.com

Counsel for Plaintiff